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Attorneys for Defendants
FOREVER 21, INC., FOREVER 21 RETAIL, INC.,
FOREVER 21 LOGISTICS, LLC, AND FOREVER XXI, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

bebe stores, inc., a California corporation; and
bebe studio, inc., a California corporation,

Plaintiffs,

v.

FOREVER 21, INC., a Delaware corporation;
FOREVER 21 RETAIL, INC., a California
corporation; FOREVER 21 LOGISTICS, LLC,
a Delaware limited liability company; and
FOREVER XXI, INC., a California
corporation,

Defendants.

CASE NO. C 07 0035 CRB

**STIPULATION RE DISCOVERY
DEADLINES; ORDER THEREON**

Judge: Hon. Charles R. Breyer

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| Compl. Filed: | Jan. 4, 2007 |
| 1st Am. Compl. Filed: | June 7, 2007 |
| Trial Date: | Sept. 8, 2008 |

This Stipulation Re Discovery Deadlines; Order Thereon ("Stipulation") is entered into by and between Plaintiffs bebe stores, inc., a California corporation, and bebe studio, inc., a California corporation (collectively, "bebe") on the one hand, and Defendants Forever 21, Inc., Forever 21 Retail, Inc., Forever 21 Logistics, LLC, and Forever XXI, Inc. (collectively, "Forever 21") on the other.

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RECITALS

- A. The current discovery deadline is March 28, 2008.
- B. A settlement conference is set for March 4, 2008 before Judge Spero.
- C. A case management conference is set for March 7, 2008 before Judge Breyer.

STIPULATION

- 1. The parties agree that continuing the ten (10) depositions set for the week of February 25, 2008, and avoiding the accompanying cost and expenses each party would incur in those depositions would maximize the potential for the parties to reach a settlement at the March 4, 2008, settlement conference.
- 2. The parties therefore stipulate and agree that, to and until a comprehensive case management schedule is set at the March 7, 2008, case management conference, all existing deadlines, including the existing March 28, 2008, discovery deadline, be enlarged by two months.
- 3. The parties further stipulate and agree that, in the event this Court grants that additional time, the ten (10) third party depositions set for the week of February 25, 2008, be continued to a date following the March 4, 2008, settlement conference.
- 4. The parties further stipulate and agree that, in the event this Court grants that additional time, defendant Forever 21 will allow plaintiff bebe three additional weeks in which to respond to Forever 21's pending discovery requests.

DATED: February 22, 2008 JEFFER, MANGELS, BUTLER & MARMARO LLP
 PAUL L. WARNER
 MATTHEW S. KENEFICK

By: /s/ MATTHEW S. KENEFICK
 MATTHEW S. KENEFICK
 Attorney for Defendants FOREVER 21, INC.,
 FOREVER 21 RETAIL, INC., FOREVER 21
 LOGISTICS, LLC, AND FOREVER XXI, INC.

1 DATED: February 22, 2008

BRYAN CAVE LLP
SEAN K. MCELENNEY
GEORGE C. CHEN

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4 By: /s/ SEAN K. MCELENNEY
SEAN K. MCELENNEY
Attorney for Plaintiffs bebe stores, inc., a California
5 corporation, and bebe studio, inc.

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7 **PROPOSED ORDER**

8 After considering the stipulation of the parties, and good cause appearing,

9 IT IS HEREBY ORDERED that, to and until a comprehensive case management
10 schedule is set at the March 7, 2008, case management conference, all existing deadlines, including
11 the existing March 28, 2008, discovery deadline, are enlarged by two months.

12 IT IS FURTHER ORDERED that the ten (10) third party depositions set for the
13 week of February 25, 2008, are continued to a date following the March 4, 2008, settlement
14 conference and that the persons and entities served with subpoenas for those depositions remain
15 subject to those subpoenas and do not need to be served again.

16 IT IS FURTHER ORDERED that plaintiff bebe has three additional weeks in which
17 to respond to Forever 21's pending discovery requests.

18 DATED: February 25, 2008

19 The Honorable Charles R. Breyer

